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6 UNITED STATES DISTRICT COURT
7 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

8 Ignacio LANUZA,

9 Plaintiff,

10 v.

11 UNITED STATES OF AMERICA,

12 Defendants.
13

Case No. 2:14-cv-01641-BJR

**DECLARATION OF MATT
ADAMS**

14 I, Matt Adams, declare as follows:

15 1. I submit this declaration in support of Plaintiff's response to Defendant's motion
16 for fees and costs. I am over the age of 18, have personal knowledge of the facts set forth herein,
17 and, if called as a witness, I could and would testify competently as set forth below.

18 2. I am lead counsel for the Plaintiff and an attorney at the Northwest Immigrant
19 Rights Project, counsel of record for Plaintiff.

20 3. Attached as Exhibit A is a true and correct copy of an email that Timothy Durkin
21 sent to me on Friday, August 16, 2019.

22 I declare under penalty of perjury of the laws of the State of Washington and the United
23 States that the foregoing is true and correct to the best of my knowledge and belief.

1 Executed this 10th day of September, 2019, in Seattle, Washington.

2 s/ Matt Adams

3 Matt Adams

4 Northwest Immigrant Rights Project

5 615 Second Avenue, Suite 400

6 Seattle, WA 98104

7 (206) 957-8611

8 matt@nwirp.org

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on September 10, 2019, I electronically filed the foregoing
3 declaration and attached exhibits with the Clerk of the Court using the CM/ECF system which
4 will send notification of such filing to the following:

5 Timothy M. Durkin: USAWAE.TDurkinECF@usdoj.gov
6 CaseView.ECF@usdoj.gov
7 Tim.Durkin@usdoj.gov
kendall.curtis@usdoj.gov
mary.f.buhl@usdoj.gov

8 And I hereby certify that I have mailed by United States Postal Service the documents to the
9 following non CM/ECF participants:

10 None.

11
12 Dated: September 10, 2019

s/ Aaron Korthuis
615 Second Ave. Suite 400
Seattle, WA 98104
Tel: (206) 816-3872
aaron@nwirp.org